4822

ACKNOWLEDGEMENT AND RECORD OF SPCC INSPECTION AND PLAN REVIEW
ONSHORE OIL PRODUCTION FACILITIES
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY – REGION 6

1445 Ross Avenue, 6 SF-PO, Dallas, Texas 75202-2733

SPCC Inspection #: FY-INSP- 100264	FRP ID: FRP-06- LA 00649
SPCC Inspection Date: 2/3/10 Time: 0900	FRP Inspection Date: Time:

Name of Facility: Little Temple Field Facility

Latitude: 29°34'33.9 29.57608 Longitude: 90°10'23.4 -90.173 17 Source: Plan

Facility Address/Location:

☐ Tribal Land Reservation Name: N/A

City: County/Parish: Lafourche State: LA Zip:

Facility Contact: Henri deLaunay Title: Env Coordinator

Telephone Number: 713-289-2671 Email: ddaunay@hilcorp.com

Name of ☑ Owner/☑ Operator: Hilcorp Energy Company

Address: 1201 Louisiana St Suite 1400

City: Houston State: TX Zip: 77002

Contact: Henri deLaunay Title: Env Coordinator

Telephone Number: same Email: same

Synopsis of Business: Onshore production facility

How many employees work at this facility? 1

If unmanned, how many employees maintain this facility?

Is the Facility: ☑ Unattended ☐ Attended(☐ Daily (8 hr) ☐ Daily (24 hr) ☑ Periodically)

NAICS #: 211111

Route of Entry to Waterway: Located in Oilfield Access Canal

Distance to waterway (in feet): 20'

Relative direction to water body: Elevation above water body (ft): 10

SPCC inspector name: Chris Perry	FRP inspector name:
Team members: Eric Hodwin (Stat)	Team members:
SPCC Plan review by: Chris Perry	FRP review by:
Date of review: 2/3/10	Date of review:

Acknowledgement of Inspection

Company Contact: Title: EHS Coordinator

Inspector: Chris Perry Title: EPA

9679719

Memorandum Of Understanding
(Check all applicable descriptions)

Non-Transportation Related	Transportation Related		
☑ EPA	☐ USCG	☐ MMS	☐ OPS

Facility Type

Onshore Oil:	Offshore Oil:
☑ Production ☐ Drilling/workover	☐ Drilling, Production and Workover

☐ **Bulk Storage** (check all applicable descriptions)

☐ Aviation	☐ Federal Facility	☐ Petroleum Distributor	☐ Service Station
☐ Animal Fats & Oils	☐ Gathering Facility	☐ Petroleum Marketing Terminal	☐ Transporter (Truck/Rail)
☐ Asphalt Paving	☐ Hospital	☐ Pipeline Bulk Storage	☐ Tribal
☐ Asphalt Coatings	☐ Manufacturing, Lube/Grease	☐ Railroad	☐ Utilities
☐ Auto Dealership	☐ Marina	☐ Remediation/Recycling	☐ State
☐ Bulk Packing	☐ Military	☐ Refinery	☐ Local
☐ Concrete/Cement	☐ Mining	☐ Rental Car Company	☐ Other:
☐ Crude Petroleum	☐ Natural Gas Liquids	☐ Sand & Gravel facility	_____
☐ Farm	☐ Petrochemical	☐ School/University	

Applicable Storage Containers
(Check all applicable descriptions)

☑ Aboveground Storage Tanks	☐ Underground Storage Tanks	☑ Drums	☑ In-plant piping (Including flow lines)	☐ Other containers
☐ Mobile/portable storage Units	☐ Surface impoundments	☐ Lagoons	☑ Equipment	_____ _____

Storage Function
(Check all applicable descriptions)

☑ Transferring	☐ Distributing	☐ Processing	☐ Gathering	☐ Consuming/Using	☐ Operations

Facility Storage Capacities

AST Storage Capacity (gal):	UST Storage Capacity (gal):	Total Facility Capacity (gal):
31600 Bbls		3600 Bbls

Types of Oil Stored:

☑ Crude oil ☐ Gasoline ☐ Diesel ☐ Fuel oil ☐ Jet fuel ☐ Vegetable oil/animal fats, grease

☐ Other: _____

Qualified Facility Thresholds: ☐ <5,000 Gallons	☐ YES ☑ NO
The aggregate aboveground storage capacity is 10,000 Gallons or less *112.3(g)(1)* **AND**	☐ YES ☑ NO
The facility has had no single discharge exceeding 1,000 U. S. gallons, and the facility has had no two discharges exceeding 42 U.S. gallons within any twelve-month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to the rule if the facility has been in operation for less than three years. (Note: Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this qualification determination.) *112.3(g)(2)*	☐ YES ☑ NO
Is the facility considered a Qualified Facility? If YES to both questions above, **AND** the owner/operator has self certified the SPCC Plan, then check YES and complete Appendix A	☐ YES ☑ NO

GENERAL APPLICABILITY - 40 CFR 112.1

Does the facility maintain an aggregate aboveground oil storage capacity of over 1,320 gallons, and/or completely buried oil storage capacity of over 42,000 gallons? ☑ YES ☐ NO

and

Is the facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location could reasonably be expected to discharge oil into or upon the navigable waters of the United States (as defined in 40 CFR 110.1)? ☑ YES ☐ NO

If YES to both, the facility is regulated under 40 CFR 112.

Note: The following storage capacity is not considered in determining applicability of SPCC requirements:

- *Completely buried tanks subject to all the technical requirements of 40 CFR 280 or a state program approved under 40 CFR 281.*
- *Equipment subject to the authority of the U.S. Department of Transportation, U.S. Department of the Interior, or Minerals Management Service, as defined in Memoranda of Understanding dated November 24, 1971, and November 8, 1993.*
- *Any facility or part thereof used exclusively for wastewater treatment and not used to satisfy SPCC requirements.*
- *Containers smaller than 55 gallons.*
- *Permanently closed containers.*

FACILITY RESPONSE PLAN (FRP) APPLICABILITY

Does the facility transfer oil over water to or from vessels and has a total oil storage capacity greater than or equal to 42,000 gallons?	☐ YES ☐ NO
Or, Does the facility have a total oil storage capacity of at least 1 million gallons, **And,** at least one of the following is true:	☐ YES ☑ NO
The facility does not have secondary containment sufficiently large enough to contain the capacity of the largest aboveground tank plus sufficient freeboard for precipitation.	☐ YES ☑ NO
The facility is located at a distance such that a discharge could cause injury to fish and wildlife and sensitive environments.	☑ YES ☐ NO
The facility is located such that a discharge would shut down a public drinking water intake.	☐ YES ☑ NO
The facility has had a reportable discharge greater than or equal to 10,000 gallons in the past 5 years.	☐ YES ☑ NO
If YES to any of the above, the facility is a non-transportation related onshore facility required to prepare and implement a FRP as outlined in 40 CFR 112.20.	

Does the facility maintain a FRP? ☐ YES ☐ NO ☐ Not Required — FRP Number: *FRP-06-* LA 00649

Does the Plan include a signed copy of the Certification of the Applicability of the Substantial Harm Criteria per 40 CFR Part 112.20(e)? *Attachment C-II* ☑ YES ☐ NO

Comment: Applicability form needs to be adjusted to match the above.

REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF A SPCC Plan – 40 CFR 112.3

Facility Startup Date:	Date of initial SPCC Plan preparation:	Current Plan version (date/number):
mid 70s		Sep 06

For facilities (excluding farms) in operation prior to August 16, 2002, was the Plan amended and implemented by November 10, 2009? *112.3(a)* ☐ YES ☐ NO ☐ N/A

For facilities (excluding farms) beginning operation between August 17, 2002 and November 10, 2009, is the Plan prepared and fully implemented by November 10, 2009? *112.3(a)* ☐ YES ☐ NO ☐ N/A

For facilities beginning operation after November 10, 2009, was the Plan implemented before beginning operations? *112.3(b) & (c)* ☐ YES ☐ NO ☐ N/A

Is an SPCC Plan prepared? ☐ YES ☐ NO ☐ N/A

Professional Engineer certification must include statements that the PE attests to. *112.3(d)*

He/she is familiar with the requirements of the SPCC rule. (i) ☑ YES ☐ NO ☐ N/A

He/she or his/her agent has visited and examined the facility. (ii) ☑ YES ☐ NO ☐ N/A

The Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of the SPCC rule. (iii) ☑ YES ☐ NO ☐ N/A

Procedures for required inspections and testing have been established(iv) ☐ YES ☐ NO ☒ N/A

The Plan is adequate for the facility. (v) ☐ YES ☐ NO ☒ N/A

Is the SPCC Plan fully PE certified? *112.3(d)* ☑ YES ☐ NO Date of Certification: 9-19-06

Name of Professional Engineer: Allison Boucvalt

License Number: 32492 State: LA

Is an SPCC Plan available for review? ☑ YES ☐ NO (During normal working hours) *112.3(e)(2)*	Is an SPCC Plan maintained on site? ☑ YES ☐ NO (For at least 4 hours/day, excluding oil production facilities) *112.3(e)(1)*

AMENDMENT OF SPCC PLAN BY REGIONAL ADMINISTRATOR (RA) – 40 CFR 112.4

Have there been reportable spills at this facility of more than 1,000 gallons? *112.4(a)* ☐ YES ☐ NO ☑ N/A

Or, has the facility had two spills of more than 42 gallons in the past 12 months? *112.4(a)* ☐ YES ☐ NO ☑ N/A

If YES to either, was information submitted to the RA as required in §112.4(a)? ☐ YES ☐ NO ☑ N/A

Date of spills: _____

Comment:

AMENDMENT OF SPCC PLAN BY THE OWNER OR OPERATOR—40 CFR 112.5

Has there been any change of facility design (construction, operation, or maintenance) that could affect the facility's potential for discharge? *(112.5a)* ☐ YES ☐ NO ☑ N/A

If YES, was the amendment within 6 months and was a plan change ☐ Yes ☐ No **or** a design change ☐ Yes ☐ No

Is the SPCC Plan reviewed and evaluated every 5 years? ☑ YES ☐ NO ☐ N/A

If amended and implemented (if necessary), is it documented in the Plan (sign off sheet)? *112.5(b)* ☐ YES ☐ NO ☑ N/A

Date of latest change: _____ Certification #: _____

Name of PE certifying amendments *112.5(c) (Except for self certified Plans)*: _____

License #: _____ State: _____ Date of Certification: _____

Reason for amendment: _____

Comment: _____

GENERAL REQUIREMENTS FOR SPCC PLANS 112.7(a-d)	Plan Review	Field Verification
Does the SPCC Plan indicate (by signature and date) that management has approved the plan? *112.7* Mgmt Personnel Name: Henri delaunay Mgmt Personnel Title: Env Coordinator	☑ YES ☐ NO ☐ N/A	
Does the Plan format follow the sequence in the rule? *112.7* or	☐ YES ☑ NO ☐ N/A	
If no, is a cross-reference provided?	☐ YES ☑ NO ☐ N/A	
Does the Plan call for additional facilities or procedures, methods, or equipment not yet fully operational?	☐ YES ☐ NO ☒ N/A	
If yes, are the following items discussed in the Plan? ☐ Installation ☐ Start-up	☐ YES ☐ NO ☒ N/A	
Does the Plan include a discussion of conformance with SPCC requirements? *112.7(a)(1)*	☑ YES ☐ NO ☐ N/A	
Does the Plan deviate from SPCC requirements? *112.7(a)(2)*	☐ YES ☐ NO ☒ N/A	
If yes, does the plan provide: Written documentation validating/explaining rational for non-conformance with the SPCC requirements? and	☐ YES ☐ NO ☒ N/A	
Written documentation outlining/detailing the alternative method/how it achieves environmental equivalence?	☐ YES ☐ NO ☒ N/A	

Does the Plan contain a facility diagram? *112.7(a)(3)*	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Does the diagram include:		
- The location and contents of each container? **and**	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Completely buried storage tanks? **and**	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Transfer stations? **and**	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Connecting pipes?	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Is there a description in the Plan of the physical layout of the facility and includes: *112.7(a)(3)*	☑ YES ☐ NO ☐ N/A	
- The type of oil in each container and its storage capacity? *112.7(a)(3)(i)*	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Discharge prevention measures including procedures for routine handling of products? *112.7(a)(3)(ii)*	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Discharge or drainage controls, such as secondary containment around containers, and other structures, equipment, and procedures for the control of a discharge? *112.7(a)(3)(iii)*	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Countermeasures for discharge discovery, response, and cleanup (including facility and contractor resources)? *112.7(a)(3)(iv*	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Methods for disposal of recovered materials in accordance with applicable legal requirements? *112.7(a)(3)(v)*	☐ YES ☐ NO ☒ N/A	
- Contact list and phone numbers for the facility response coordinator, NRC, cleanup contractors, and federal, state, and local agencies who must be notified in the case of a discharge as described in §112.1(b)? *112.7(a)(3)(vi)*	☐ YES ☐ NO ☒ N/A	
Does the Plan include information and procedures for reporting a discharge (exact location, phone number, date/time of material discharged, quantity, actions taken, evacuations, notifications,(names/organizations etc.)? *112.7(a)(4)*	☐ YES ☑ NO ☐ N/A	
Does the Plan include procedures to use when a discharge may occur? *112.7(a)(5)*	☐ YES ☑ NO ☐ N/A	
Does the Plan include a prediction and description of major equipment failure(s) that could result in a discharge from the facility per *40 CFR 112.7(b)*? ☑ direction, ☑ rate of flow, and ☑ total quantity of oil	☑ YES ☐ NO ☐ N/A	
Does the Plan discuss appropriate containment and/or diversionary structures/equipment (dikes, berms, retaining walls, curbing, culverts, gutters/drain systems, weirs, boom, diversion/retention ponds, sorbent material) and is sufficiently impervious to contain oil. per *40 CFR 112.7(c)*	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Has it been determined in the Plan, that the installation of structures or equipment (containment) is not practicable? *112.7(d)* If YES, check ☐ **then 40 CFR Part 109 Checklist must be filled out and,**	☐ YES ☐ NO ☑ N/A	
- Is the impracticability clearly demonstrated?	☐ YES ☐ NO ☑ N/A	
- For bulk storage containers, is periodic integrity testing of containers and leak testing of the valves and piping associated with the container conducted?	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
- Is a strong contingency plan per 40 CFR 109 provided? *112.7(d)(1)*	☐ YES ☐ NO ☑ N/A	
- Is a written commitment of manpower, equipment, and material (to control and remove any quantity of oil discharged) provided in the SPCC plan? *112.7(d)(2*	☐ YES ☐ NO ☑ N/A	

Comment: The plan has no crossreferance. There are no procedures listed for reporting a discharge or procedures to follow if there is a discharge.

INSPECTIONS, TESTS, AND RECORDS 112.7(e)	Plan Review	Field Verification
Are inspections and tests required by 40 CFR 112 conducted in accordance with written procedures developed for the facility? *112.7(e)*	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
If Yes, are written procedures, records of inspections and/or customary business records:		
- Signed by the appropriate supervisor or inspector?	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Kept with the SPCC Plan?	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Maintained for a period of three (3) years?	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A

Comment: Plan states that they should conduct daily visual inspections and only do paperwork if there is a problem.

PERSONNEL TRAINING AND DISCHARGE PREVENTION PROCEDURES 112.7 (f)	Plan Review	Field Verification
Are oil handling personnel trained on: *112.7(f)(1)*		
- The operation and maintenance of equipment to prevent the discharge of oil?	☑ YES ☐ NO ☐ N/A	☐ YES ☑ NO ☐ N/A
- Discharge procedure protocols (discovery and notification)?	☐ YES ☑ NO ☐ N/A	☐ YES ☑ NO ☐ N/A
- Applicable pollution control laws, rules, and regulations?	☑ YES ☐ NO ☐ N/A	☐ YES ☑ NO ☐ N/A
- General facility operations?	☐ YES ☑ NO ☒ N/A	☐ YES ☑ NO ☒ N/A
- The contents of the Plan?	☐ YES ☑ NO ☒ N/A	☐ YES ☑ NO ☒ N/A
Is there a designated person accountable for spill prevention? *112.7(f)(2)* Name and title of individual? Rohn Webre	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Are spill prevention briefings scheduled periodically? *112.7(f)(3)* What is the schedule (minimum at least once a year)? ☐ Monthly ☐ Quarterly ☐ Semi-annually ☐ Annual	☐ YES ☑ NO ☐ N/A	☐ YES ☑ NO ☐ N/A

Comment: Records are kept at Corporate and are not available for review

FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK (excluding offshore facilities) 112.7(h-j) [Note: In general, production tank batteries will not have a loading/unloading rack system] Environmental Equivalence ☐ (If environmental equivalence declared by PE, complete Appendix D of this checklist)	Plan Review	Field Verification
Does the facility have a loading/unloading/transfer area? If yes,	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Does the facility have containment consistent with 112.7(c) as required by 12.1(a)(1)/112.7? If NO,	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Does the facility meet the containment provisions consistent with 112.9 (c)(2)?	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Does the facility contain a loading/unloading rack? If Yes,	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
Does drainage from loading/unloading areas and/or locations (adjacent to the loading or unloading racks) flow to catchment basin(s), **or**	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
- Treatment system? *112.7(h)(1)*	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
- If NO to either, is quick drainage system used?	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
Are containment systems designed to hold at least the maximum capacity of any largest single compartment of a tank car or tank truck (when at the loading/unloading rack)?	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
Is there a system used to prevent departure (tank trucks/tank cars) before completing the disconnection from transfer lines? *112.7(h)(2)* *EE* ☐	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
If YES, are there:		
- Interlocked warning lights? **or**,	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
- Physical barrier systems (i.e., wheel locks)? **or**,	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
- Warning signs? **or**,	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
- Vehicle brake interlock system	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
Are tank cars/tank trucks lower most drains and all outlets inspected for discharges prior to filling and departure? *112.7(h)(3)*, (note; do procedures ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit) *EE* ☐	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A

Comment Plan does not have a section for the transfer area.

Does the Plan include a risk analysis and/or evaluation of field-constructed aboveground tanks for brittle fracture after tank repair/alteration/ or when a change in service has occurred? *112.7(i)*	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A

Comment

Does the Plan include a discussion of conformance with applicable requirements of the SPCC rule or any applicable state rules, regulations, and guidelines *and* other effective discharge prevention and containment procedures listed in 40 CFR Part 112? *112.7(i)*	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A

Comment

QUALIFIED OIL-FILLED OPERATIONAL EQUIPMENT SECONDARY CONTAINMENT OPTION 112.7(k)	Plan Review	Field Verification
Is there qualified oil-filled operational equipment at the facility? (Oil storage containers and associated piping intrinsic to the operation of the equipment in which the oil is present solely to support the function of the apparatus or the device.) If YES,	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
Has the facility had a single reportable discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?, and/or,	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
Has the facility had two reportable discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?, if NO to both,	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
-Has the facility met the criteria for the secondary containment option?	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
If YES for either, secondary containment is required. See 112.7(c). If NO and no secondary containment is provided, then:	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
- Are facility procedures for inspections/monitoring program established and documented? *112.7(k) (2)(i)*	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A

- Does the facility maintain a Facility Response Plan? *112.7(k) (2)(ii),* **OR**	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
- Is there a Contingency plan following 40 CFR part 109 (see Appendix C checklist) is provided? **AND**	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A
- Is there a written commitment of manpower, equipment, and materials required to control and remove any quantity of oil discharged that may be harmful?	☐ YES ☐ NO ☑ N/A	☐ YES ☐ NO ☑ N/A

Comment

OIL PRODUCTION FACILITY DRAINAGE 112.9 (b) Note: See Tank and Secondary Containment Forms **Environmental Equivalence** ☐ (If environmental equivalence declared by PE, complete Appendix D of this checklist)	**Plan Review**	**Field Verification**
At tank batteries, separation **and** treating areas where there is a reasonable possibility of a discharge, is drainage closed and sealed at all times except when draining uncontaminated rainwater? *112.9(b)(1)* If YES, *EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Is accumulated oil on the rainwater removed and returned to storage or dispose of in accordance with legally approved methods? *112.9(b)(1)* *EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Prior to drainage of the diked area(s), is the rainwater:		
- Inspected to ensure that its presence will not cause a discharge? *112.8(c)(3)(ii)* *EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Bypass valves opened and resealed under supervision? *112.8(c)(3)(iii)* *EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Are adequate records of rainwater drainage events documented and maintained? *112.8(c)(3)(iv)* *EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Are field drainage systems (ditches, oil traps, sumps, or skimmers) inspected for accumulation of oil? *112.9(b)(2)* If Yes, *EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Is accumulated oil promptly removed? *EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A

Comment: Plan has no 112.9 section because it is written as an offshore instead of onshore facility

OIL PRODUCTION FACILITY BULK STORAGE CONTAINERS 112.9 (c) **Environmental Equivalence** ☐ (If environmental equivalence declared by PE, complete Appendix D of this checklist)	Plan Review	Field Verification
Are the materials and construction of the containers compatible with the oil stored and the conditions of storage? *112.9(c)(1)* EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Do all tank battery, separation, and treating facility installations have adequate secondary means of containment for the capacity of the largest single container plus sufficient freeboard for precipitation? *112.9(c)(2)*	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Is drainage from undiked areas confined in a catchment basin or holding pond? *112.9(c)(2)*	☐ Adeq ☑ Inad ☐ N/A	☑ YES ☐ NO ☐ N/A
Are containers, including tank foundation and supports, visually inspected for deterioration and maintenance needs on a periodic and regularly scheduled basis? *112.9(c)(3)* EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- At what frequency?:		
- Daily, **or**	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Weekly, **or**	☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
- Monthly, **or**	☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
- Annual, **or**	☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
- Other?	☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
Are tank battery installations in accordance with good engineering practice? *112.9(c)(4)* (One or more of the following must be satisfied) EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Do containers have:		
- Adequate capacity to prevent overfill if a pumper/gauger is delayed in making regularly scheduled rounds? *112.9(c)(4)(i)* **or** EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Overflow equalizing lines between containers so that a full container can overflow to an adjacent container? *112.9(c)(4)(ii)* **or** EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Vacuum protection to prevent container collapse? *112.9(c)(4)(iii)* **or** EE ☐	☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
- High level sensors to generate and transmit alarms where facilities are part of a computer production control system? *112.9(c)(4)(iv)* EE ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A

Comment: There is no 112.9c in plan since the plan was written as offshore.

FACILITY TRANSFER OPERATIONS, OIL PRODUCTION FACILITY 112.9 (d) **Environmental Equivalence** ☐ (If environmental equivalence declared by PE, complete Appendix D of this checklist)	Plan Review	Field Verification
Are aboveground valves/piping, associated with transfer operations, inspected periodically on a regular schedule (to include flange joints, valve glands, drip pans, pipe supports, stuffing boxes, bleeder/gauge valves, etc.)? *112.9(d)(1)* - At what frequency:	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Daily, **or**	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Weekly, **or**	☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
- Monthly, **or**	☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
- Annual, **or**	☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
- Other? _____.	☐ YES ☑ NO ☐ N/A	☐ YES ☐ NO ☑ N/A
Are saltwater (oil field brine) disposal facilities examined often to detect possible system upsets capable of causing a discharge particularly following a sudden change in atmospheric conditions? *112.9(d)(2)* *EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Is there a facility flowline maintenance program established and implemented? *112.9(d)(3)* *EE* ☐	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Comment: There is no 112.9 section in plan		

Qualified Facilities Checklist

N/A

Appendix A: Qualified Facility Plan Requirements

Complete this Appendix only if the facility is a "qualified facility" as defined in §112.3(g). A qualified facility's Plan, whether certified by a PE or self-certified, must comply with all of the applicable requirements of §112.7 and subparts B and C of 40 CFR Part 112 referenced earlier in this checklist.

SPCC Inspection #: *FY-INSP-*

112.6 Qualified Facility Plan Requirements	Yes	No	N/A
(a) Did the owner/operator of the qualified facility self-certify the SPCC Plan? *If **NO**, see requirements for 112.3(d) above. If **YES**, did the owner/operator certify in the Plan that:*			
(1) He or she is familiar with the requirements of 40 CFR part 112.			
(2) He or she has visited and examined the facility.			
(3) The Plan has been prepared in accordance with accepted and sound industry practices and standards.			
(4) Procedures for required inspections and testing have been established.			
(5) The Plan is being fully implemented.			
(6) The facility meets the qualification criteria set forth under §112.3 (g).			
(7) The Plan does not deviate from any requirements as allowed by §112.7(a)(2) and 112.7(d), except as described under §112.6(c).			
(8) Management has given full approval of the Plan and necessary resources have been committed for the Plan's full implementation.			
(b) Did the owner/operator self-certify any of the Plan's technical amendments?			
If **YES:** Is the certification of any technical amendments in accordance with the provisions above (§112.6(a))?			
(c)(1) and (d)(1) Environmental Equivalence. For each alternative measure allowed under §112.7(a)(2), the Plan is accompanied by a written statement by a PE that states the reason for nonconformance and describes the alternative method and how it provides equivalent environmental protection in accordance with §112.7(a)(2).			
(c)(2) and (d)(1) Impracticability. For each determination of impracticability of secondary containment pursuant to §112.7(d), the Plan clearly explains why secondary containment measures are not practicable at this facility and provides the alternative measures required in §112.7(d) in lieu of secondary containment.			
(c)(3) Security. The Plan contains one of the following: (i) The Plan complies with requirements under §112.7(g), **OR** (ii) The Plan complies with the requirements under §112.6(c)(3)(ii): Plan describes how the owner/operator secures and controls access to the oil handling, processing and storage areas; secures master flow and drain valves; prevents unauthorized access to starter controls on oil pumps; secures out-of-service and loading/unloading connections of oil pipelines; addresses the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.			
(c)(4) Bulk Storage Containers. The Plan contains one of the following: (i) The Plan complies with the requirements under §§112.8(c)(6) or 112.12(c)(6), as applicable; **OR** (ii) The Plan complies with the requirements under §112.6(c)(4)(ii): • Aboveground containers, supports and foundations tested for integrity on a regular schedule and whenever repairs are made. • Appropriate qualifications for personnel performing tests and inspections have been determined in accordance with industry standards. • The frequency and type of testing and inspections have been determined in accordance with industry standards, taking into account container size, configuration and design. • Container supports and foundations regularly inspected • Outside of containers frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas • Records of inspections and tests maintained			
(d) Did a PE certify a portion of a qualified facility's self-certified Plan?			

*If **YES**, the PE must certify in the Plan that:*			
(d)(2) (i) He/she is familiar with the requirements of 40 CFR Part 112. (ii) He/she or a representative agent has visited and examined the facility. (iii) The alternative method of environmental equivalence in accordance with §112.7(a)(2) or the determination of impracticability and alternative measures in accordance with §112.7(d) is consistent with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112.			
(b)(1) If a PE certified a portion of the Plan, did a PE certify any technical amendments that affect this portion of the Plan?			
Comments:			

Appendix B: Container Inspection Form

Container ID: 115322 SPCC Inspection #: FY-INSP-100064

Maximum capacity (gal): 1,500 BBL Container height (ft): 24

Nominal capacity (gal): _____ Container diameter (ft): ~20 Year Built: _____

Current Status: [X] Active [ ] Standby [ ] Out of service [ ] Closed

Material(s) Stored in Container:

[X] Crude oil [ ] Gasoline [ ] Diesel [ ] Fuel oil [ ] Jet fuel [ ] Vegetable oil/animal fats, grease

Other: _____

Container Type:

[ ] Vertical Cylindrical	[ ] External Floating Roof	[ ] Geodesic Dome
[X] Fixed Roof (Vented)	[ ] Internal Floating Roof	[ ] Spheroid
[ ] Coned Roof – (Vented)	[ ] Hemispheroid (Noded)	[ ] Horizontal Cylindrical
[ ] Coned Roof – (Not Vented)	[ ] Hemispheriod (Not Noded)	Other: _____

Container Material:

[X] Single Wall Steel	[ ] Not Painted	[ ] Wooden
[ ] Double Wall Steel	[ ] Fiberglass Reinforced Plastic	Other:
[ ] Painted	[ ] Composite (steel with fiberglass)	GALVANIZED

Container Construction: [ ] Welded [ ] Riveted [X] Bolted [ ] Shop Fabricated [ ] Field Erected

Container Cathodic Protection: [X] None [ ] Sacrificial Anode(s) [ ] Impressed Current

Inspect container including the base for leaks, specifically looking for:

Drips, weeps, & stains:	Discoloration of tank:	Corrosion:
[ ] Check if present and check if:	[ ] Check if present and check if:	[ ] Check if present and check if:
Acceptable [ ]	Acceptable [ ]	Acceptable [ ]
Or, if Unacceptable [ ],	Or, if Unacceptable [ ],	Or, if Unacceptable [ ],
[X] Adequate	[X] Adequate	[X] Adequate

Comment on container inspection: _____

Container Foundation Material:

[ ] Earthen Material [ ] Ring Wall [ ] Concrete (w/impermeable mat.) [ ] Concrete (w/o impermeable mat.)

[ ] Steel [ ] Unknown Other: CREOSOTE WOOD MATS

Inspect container foundation, specifically looking for:

Cracks:	Settling:	Gaps (between tank and foundation):
[X] Check if present and check if:	[ ] Check if present and check if:	[ ] Check if present and check if:
Acceptable [X]	Acceptable [ ]	Acceptable [ ]
Or, if Unacceptable [ ],	Or, if Unacceptable [ ],	Or, if Unacceptable [ ],
[ ] Adequate	[X] Adequate	[X] Adequate

Comment on foundation inspection:
CRACKS BETWEEN MAT BOARDS, BUT MAT IS IN SECONDARY CONTAINMENT; CRACKS ~ 1/2" TO 1" WIDE.

Container Piping Construction:

☒ Aboveground ☐ Underground ☐ Steel (bare) ☒ Steel (painted) ☐ Steel (galvanized)

☐ Double walled ☐ Copper ☐ Fiberglass reinforced plastic ☐ Unknown

Other: _____

Inspect pipes/valves, specifically looking for:

Leaks at joints, seams, valves:
☐ Check if present and if:
Acceptable ☐
Or, if Unacceptable ☐,
☒ Adequate

Discoloration:
☐ Check if present and if:
Acceptable ☐
Or, if Unacceptable ☐,
☒ Adequate

Corrosion:
☒ Check if present and if:
Acceptable ☐
Or, if Unacceptable ☐,
☐ Adequate

Bowing of pipe:
☐ Check if present and if:
Acceptable ☐
Or, if Unacceptable ☐,
☒ Adequate

Pooling of stored material:
☐ Check if present and if:
Acceptable ☐
Or, if Unacceptable ☐,
☒ Adequate

Comment on piping/valve inspection:
SMALL AREAS OF CORROSION ON PIPING, BUT ~~MAINTENANCE~~ NOT HEAVY

Secondary Containment Types:

☒ Dikes/berms/retaining walls ☐ Curbing ☐ Culverts and/or gutters ☐ Spill diversion ponds

☐ Sorbent Materials ☐ Retention Ponds ☐ Weirs and/or booms

Other – Loc.: _____

Secondary Containment Checklist:

☐ Capacity does not appear to be adequate?
☐ Not sufficiently impervious to stored material?
☒ Standing water within dike or berm?
☐ Erosion or corrosion of dike or berm?
Location: _____
☐ Drainage mechanism manually operated?
☐ Presence of stored material within dike or berm?
☐ Debris/vegetation within or on the dike or berm area?

Comment on containment inspection:
SALTWATER TANK HAS 12" GAPS BETWEEN MAT BOARDS (FOUNDATION); ~~SOBSTAN~~ SUBSTANTIAL AMOUNT OF WATER IN BERM

SPCC CONTINGENCY PLAN REVIEW CHECKLIST

N/A

Appendix C: 40 CFR Part 109–Criteria for State, Local and Regional Oil Removal Contingency Plans

If a facility makes an impracticability determination for secondary containment in accordance with §112.7(d), it is required to provide an oil spill contingency plan following 40 CFR, part 109. Items below must be addressed in the Plan and implemented at the facility.

SPCC Inspection #: *FY-INSP-*_____

109.5 Development and implementation criteria for State, local and regional oil removal contingency plans.	Yes	No
(a) Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations.	☐	☐
(b) Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including:	☐	☐
(1) The identification of critical water use areas to facilitate the reporting of and response to oil discharges.	☐	☐
(2) A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered.	☐	☐
(3) Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., NCP).	☐	☐
(4) An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority.	☐	☐
(c) Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including:	☐	☐
(1) The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally.	☐	☐
(2) An estimate of the equipment, materials and supplies which would be required to remove the maximum oil discharge to be anticipated.	☐	☐
(3) Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge.	☐	☐
(d) Provisions for well defined and specific actions to be taken after discovery and notification of an oil discharge including:	☐	☐
(1) Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel.	☐	☐
(2) Pre-designation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans.	☐	☐
(3) A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations.	☐	☐
(4) Provisions for varying degrees of response effort depending on the severity of the oil discharge.	☐	☐
(5) Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses.	☐	☐
(e) Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.	☐	☐

Environmental Equivalence (EE) Checklist

N/A

Appendix D: Environmental Equivalence Requirements

Complete this Appendix only if the facility has declared "environmental equivalence" measures as described in § 112.7(a)(2). Facility owners and operators have the flexibility to deviate from specific rule provisions if the Plan states the reason for nonconformance and if equivalent environmental protection is provided by some other means of SPCC. EE declarations must be certified by a PE. For EE declarations, see portions of checklist referenced earlier.

SPCC Citation:	SPCC Inspection #: *FY-INSP-*_____
Is there written documentation validating/explaining rational for non-conformance with the SPCC requirements?	☐ YES ☐ NO
Is there written documentation outlining/detailing how the alternative method achieves environmental equivalence? **and,**	☐ YES ☐ NO
Is the alternative method: Technically feasible? Logistically sound? Practicable?	 ☐ YES ☐ NO ☐ YES ☐ NO ☐ YES ☐ NO
Name of Professional Engineer: _____ License Number: _____ State: _____ Other PE certification requirements: Did a PE certify a portion of a qualified facility's self-certified Plan? ☐ YES ☐ NO	
Description of environmental equivalence:	
Inspector Comment:	

* Use additional Appendix D forms for multiple Environmental Equivalent declarations.

Spill Prevention Control and Countermeasure Inspection Findings, Alleged Violations, and Proposed Penalty Form

(Note: Do not use this form if there is no secondary containment)

These Findings, Alleged Violations and Penalties are issued by EPA Region 6 under the authority vested in the Administrator of EPA by Section 311(b)(6)(B)(I) of the Clean Water Act, as amended by the Oil Pollution Act of 1990.

Company Name: Hilcorp Energy Company

Docket Number: CWA –06-2009-

Facility Name: Little Temple Field Facility

Date: 2/3/10

Address:

Inspection Number: FY-INSP- 100064

~~City:~~ Lafourche Parish

Inspectors Name: Chris Perry

State: LA

Zip Code:

EPA Approving Official: Donald P. Smith

Contact: Henri deLaunay

Enforcement Contacts: Nelson Smith (214)665-8489 or Bryant Smalley (214) 665-7368

Summary of Findings

(Onshore Oil Production Facilities)

GENERAL TOPICS: 112.3(a),(d),(e); 112.5(a), (b), (c); 112.7 (a), (b), (c), (d)
(When the SPCC Plan review penalty exceeds $1,500.00 enter only the maximum allowable of $1,500.00.)

- ☐ No Spill Prevention Control and Countermeasure Plan- *112.3* $1,500.00
- ☐ Plan not certified by a professional engineer- *112.3(d)* 450.00
- ☐ Certification lacks one or more required elements- *112.3(d)(1)* 100.00
- ☐ No management approval of plan- *112.7* 450.00
- ☐ Plan not maintained on site (if facility is manned at least 4 hrs/day) or not available for review- *112.3(e)(1)* 300.00
- ☐ No evidence of five-year review of plan by owner/operator- *112.5(b)* 75.00
- ☐ No plan amendment(s) if the facility has had a change in: design, construction, operation, or maintenance which affects the facility's discharge potential- *112.5(a)* 75.00
- ☐ Amendment(s) not certified by a professional engineer- *112.5(c)* 150.00
- ☑ Plan does not follow sequence of the rule and/or cross-reference not provided- *112.7* 150.00

☐ Plan does not discuss additional procedures/methods/equipment not yet fully operational- *112.7* 75.00

☐ Plan does not discuss alternative environmental protection to SPCC requirements- *112.7(a)(2)* 200.00

☐ Plan has inadequate or no facility diagram- *112.7(a)(3)* 75.00

☐ Inadequate or no listing of type of oil and storage capacity layout of containers- *112.7(a)(3)(i)* 50.00

☐ Inadequate or no discharge prevention measures- *112.7(a)(3)(ii)* 50.00

☐ Inadequate or no description of drainage controls- *112.7(a)(3)(iii)* 50.00

☐ Inadequate or no description of countermeasures for discharge discovery, response and cleanup- *112.7(a)(3)(iv)* ... 50.00

☐ Recovered materials not disposed of in accordance with legal requirements- *112.7(a)(3)(v)* 50.00

☐ No contact list & phone numbers for response & reporting discharges- *112.7(a)(3)(vi)* 50.00

☑ Plan has inadequate or no information and procedures for reporting a discharge- *112.7(a)(4)* 100.00

☑ Plan has inadequate or no description and procedures to use when a discharge may occur- *112.7(a)(5)* 150.00

☐ Inadequate or no prediction of equipment failure which could result in discharges- *112.7(b)* 150.00

☐ Plan does not discuss and facility does not implement appropriate containment/diversionary structures/equipment- ~~(including truck transfer areas)~~ *112.7(c)* 400.00

- If claiming impracticability of appropriate containment/diversionary structures:

☐ Impracticability has not been clearly denoted and demonstrated in plan- *112.7(d)* 100.00

☐ No contingency plan- *112.7(d)(1)* 150.00

☐ No written commitment of manpower, equipment, and materials- *112.7(d)(2)* 150.00

☐ No periodic integrity and leak testing , if impracticability is claimed - *112.7(d)* 150.00

☐ Plan has no or inadequate discussion of general requirements not already specified- *112.7(a)(1)* 75.00

QUALIFIED FACILITY REQUIREMENTS: 112.6

☐ Qualified Facility: No Self certification- *112.6(a)* 450.00

☐ Qualified Facility: Self certification lacks required elements- *112.6(a)* 100.00

☐ Qualified Facility: Technical amendments not certified- *112.6(b)* 150.00

☐ Qualified Facility: Un-allowed deviations from requirements- *112.6(c)* 100.00

☐ Qualified Facility: Environmental Equivalence or Impracticability not certified by PE- *112.6(d)* 350.00

WRITTEN PROCEDURES AND INSPECTION RECORDS 112.7(e)

- [x] The Plan does not include inspections and test procedures in accordance with 40 CFR Part 112 - *112.7(e)* 75.00
- [x] Inspections and tests required by 40 CFR Part 112 are not in accordance with written procedures developed for the facility- *112.7(e)* 75.00
- [x] No Inspection records were available for review - *112.7(e)* 200.00

Written procedures and/or a record of inspections and/or customary business records:

- [x] Are not signed by appropriate supervisor or inspector- *112.7(e)* 75.00
- [x] Are not maintained for three years- *112.7(e)* 75.00

PERSONNEL TRAINING AND DISCHARGE PREVENTION PROCEDURES 112.7(f)

- [ ] No training on the operation and maintenance of equipment to prevent discharges- *112.7(f)(1)* 75.00
- [x] No training on discharge procedure protocols- *112.7(f)(1)* 75.00
- [ ] No training on the applicable pollution control laws, rules, and regulations- *112.7(f)(1)* 75.00
- [x] Training records not maintained for three years- *112.7(f)* 75.00
- [x] No training on the contents of the SPCC Plan- *112.7(f)(1)* 75.00
- [ ] No designated person accountable for spill prevention- *112.7(f)(2)* 75.00
- [x] Spill prevention briefings are not scheduled and conducted periodically- *112.7(f)(3)* 75.00
- [ ] Plan has inadequate or no discussion of personnel and spill prevention procedures- *112.7(f)* 75.00

FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING 112.7(c) and/or (h-j)

- [ ] Inadequate containment for Loading Area (not consistent with 112.7(c)) - *112.7(c)*. 400.00
- [ ] Inadequate secondary containment, and/or rack drainage does not flow to catchment basin, treatment system, or quick drainage system- *112.7(h)(1)*. 750.00
- [ ] Containment system does not hold at least the maximum capacity of the largest single compartment of any tank car or tank truck- *112.7(h)(1)*. 450.00
- [ ] There are no interlocked warning lights, or physical barrier system, or warning signs, or vehicle brake interlock system to prevent vehicular departure before complete disconnect from transfer lines- *112.7(h)(2)*..... 300.00
- [ ] There is no inspection of lowermost drains and all outlets prior to filling and departure of any tank car or tank truck- *112.7(h)(3)*..... 150.00
- [x] Plan has inadequate or no discussion of facility tank car and tank truck loading/unloading rack -*112.7(j)*. 75.00

QUALIFIED OIL OPERATIONAL EQUIPMENT 112.7(k)

☐ Failure to establish and document procedures for inspections or a monitoring program to detect equipment failure and/or a discharge- *112.7(k)(2)(i)* 150.00

☐ Failure to provide an oil spill contingency plan- *112.7(k)(2)(ii)(A)* 150.00

☐ No written commitment of manpower, equipment, and materials- *112.7(k)(2)(ii)(B)* 150.00

OIL PRODUCTION FACILITY DRAINAGE 112.9(b)

☐ Drains for the secondary containment systems at tank batteries **and** separation **and** central treating areas are not closed and sealed at all times except when uncontaminated rainwater is being drained- *112.9(b)(1)* 600.00

☐ Prior to drainage of diked areas, rainwater is not inspected, valves opened and resealed under responsible supervision and records kept of such events- *112.9(b)(1)* 450.00

☐ Accumulated oil on the rainwater is not removed and returned to storage or disposed of in accordance with legally approved methods- *112.9(b)(1)* 300.00

☐ Field drainage system (drainage ditches and road ditches), oil traps, sumps and/or skimmers are not regularly inspected and/or oil is not promptly removed- *112.9(b)(2)* 300.00

☐ Inadequate or no records maintained for drainage events- *112.7* 75.00

☑ Plan has inadequate or no discussion or procedures for facility drainages- *112.7(a)(1)* 75.00

OIL PRODUCTION FACILITY BULK STORAGE CONTAINERS 112.9(c)

☐ Plan has inadequate or no risk analysis and/or evaluation of field-constructed aboveground tanks for brittle fracture- *112.7(i)* 75.00

☐ Failure to conduct evaluation of field-constructed aboveground tanks for brittle fracture- *112.7(i)* 300.00

☐ Container material and construction are not compatible with the oil stored and the conditions of storage- *112.9(c)(1)* 450.00

☐ Size of secondary containment appears to be inadequate for containers and treating facilities- *112.9(c)(2)* 750.00

☐ Excessive vegetation which affects the integrity of the containment- *112.9(c)(2)* 150.00

☐ Walls of containment system are slightly eroded or have low areas- *112.9(c)(2)* 300.00

☐ Secondary containment materials are not sufficiently impervious to contain oil- *112.9(c)(2)* 375.00

☐ Visual inspections of containers, foundation and supports are not conducted periodically for deterioration and maintenance needs- *112.9(c)(3)* 450.00

☐ Tank battery installations are not in accordance with good engineering practice because none of the following are present- *112.9(c)(4)* 450.00

(1) Adequate tank capacity to prevent tank overfill- *112.9(c)(4)(i)*, **or**
(2) Overflow equalizing lines between the tanks- *112.9(c)(4)(ii)*, **or**
(3) Vacuum protection to prevent tank collapse- *112.9(c)(4)(ii)*, **or**
(4) High level alarms to generate and transmit an alarm signal where facilities are part of a computer control system- *112.9(c)(4)(iv)*.

☑ Plan has inadequate or no discussion of bulk storage tanks- *112.7(a)(1)* 75.00

FACILITY TRANSFER OPERATIONS, OIL PRODUCTION FACILITY 112.9(D)

☐ Above ground valves and pipelines are not examined periodically on a scheduled basis for general condition (includes items, such as: flange joints, valve glands 2nd bodies, drip pans, pipeline supports, bleeder and gauge valves, polish rods/stuffing box.)- *112.9(d)(1)* 450.00

☐ Brine and saltwater disposal facilities are not examined often- *112.9(d)(2)* 450.00

☐ Inadequate or no flowline maintenance program (includes: examination, corrosion protection, flowline replacement)- *112.9(d)(3)* 450.00

☑ Plan has inadequate or no discussion of oil production facilities- *112.7(a)(1)* 75.00

☐ Plan does not include a signed copy of the Certification of the Applicability of the Substantial Harm Criteria per 40 CFR Part- *112.20(e)* 150.00
(Do not use this if FRP subject, go to traditional enforcement)

TOTAL $ 1500.